

1 Peter Anderson, Esq. (Cal. Bar No. 88891)  
2 peteranderson@dwt.com  
DAVIS WRIGHT TREMAINE LLP  
3 865 South Figueroa Street, 24th Floor  
Los Angeles, California 90017-2566  
4 Telephone: (213) 633-6800  
Fax: (213) 633-6899

5 Attorneys for Defendant  
SONY MUSIC PUBLISHING LLC  
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7 **UNITED STATES DISTRICT COURT**  
8 **CENTRAL DISTRICT OF CALIFORNIA**  
9 **WESTERN DIVISION**

10 RODNEY OLIVER, an individual; ) Case No. 2:23-cv-08323-JAK-AS  
11 Plaintiff, )  
12 vs. )  
13 BRYSON LASHUN POTTS p/k/a NLE )  
CHOPPA, an individual; SONY MUSIC )  
14 PUBLISHING, LLC, a Delaware )  
Limited Liability Company; JAVAR )  
15 ROCKAMORE, an individual, PATRIC )  
EARL HOUSTON p/k/a PROJECT )  
16 PAT, an individual, JORDAN )  
MICHAEL HOUSTON III p/k/a JUICY )  
17 J, an individual, PAUL D. )  
BEAUREGARD p/k/a DJ PAUL, an )  
individual; THEODORE L THOMAS, )  
18 p/k/a STONII, an individual; ROBERT )  
D. REESE p/k/a BOBBY KEYZ, an )  
individual; ARCHIE JAMES DEAN )  
20 p/k/a ISTHATYOUARCHIE or )  
ATLAJD, an individual, and DOES 1- )  
21 10, )  
Defendants. )  
22 )  
23 )

[Proposed] Order  
Submitted Herewith

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## STIPULATION

This Stipulation is entered into by and between plaintiff Rodney Oliver (“Plaintiff”) and defendant Sony Music Publishing LLC (“Sony Music Publishing”) (collectively, for convenience, “the Parties”), by and through their respective counsel of record, with respect to the following:

1. Plaintiff filed this action on October 3, 2023, and in his Complaint he asserts claims for copyright infringement (Doc. 1).

2. Sony Music Publishing was served with the Summons and Complaint on October 10, 2023, and, pursuant to this Court's Local Rule 8-3 and the Parties' Stipulation filed with the Court on October 31, 2023 (Doc. 12), the time for Sony Music Publishing to respond to the Complaint has been extended to November 30, 2023.

3. Counsel for the Parties have conferred pursuant to Local Rule 7-3 regarding Sony Music Publishing's belief that there are deficiencies in Plaintiff's Complaint that are reachable by Federal Rule of Civil Procedure 12(b)(6). Plaintiff has agreed to file an amended complaint and the Parties' counsel, taking into consideration the upcoming holidays and the commitments of counsel in other matters, have agreed to jointly request the following relief.

**NOW, THEREFORE**, the Parties respectfully request that the Court enter the accompanying proposed Order that Plaintiff shall file a first amended complaint on or before December 18, 2023, that Sony Music Publishing shall have twenty-one days to respond to that first amended complaint, and that in the meantime no response need be filed to Plaintiff's initial Complaint.

**SO STIPULATED**

Dated: November 20, 2023

/s/ Scott Alan Burroughs

Scott Alan Burroughs, Esq.  
Frank R. Trechsel, Esq.  
**DONIGER / BURROUGHS**  
Attorneys for Plaintiff

1 RODNEY OLIVER  
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5 Dated: November 20, 2023  
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11 \_\_\_\_\_ /s/ Peter Anderson  
12 Peter Anderson, Esq.  
13 DAVIS WRIGHT TREMAINE LLP  
14 Attorneys for Defendant  
15 SONY MUSIC PUBLISHING LLC  
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**Attestation Regarding Signatures**

The undersigned attests that all signatories listed, and on whose behalf this filing is submitted, concur in this filing's content and have authorized its filing.

Dated: November 20, 2023

\_\_\_\_\_ /s/ Peter Anderson  
Peter Anderson, Esq.